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Attorney for Jose Manuel Chavez Zepeda

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

vs.

JOSE MANUEL CHAVEZ ZEPEDA,

Defendant.

Case No.: 2:22-cr-064 JAM

STIPULATION AND ORDER FOR
EXTENSION TO FILE SECURED
BOND AND REQUEST FOR
MODIFICATION OF TERMS OF
SECURED BOND

DATE: April 13, 2022

IT IS HEREBY STIPULATED by and between Assistant United States Attorney David Spencer, counsel for plaintiff United States of America, and attorney Clemente M. Jiménez, counsel for defendant Jose Manuel Chavez Zepeda, that the deadline to file documentation with the court of a \$500,000 secured bond be extended to Wednesday, April 20, 2022.

By previous stipulation and request of the parties, the court set a deadline of Wednesday, April 13, 2022, for Mr. Chavez Zepeda to submit documentation of a \$500,000 secured bond. After further review of Mr. Chavez Zepeda's financial circumstances, the parties hereby stipulate and request that Mr. Chavez remain on pretrial release secured by 1) payment of a \$300,000 cash bond, 2) the equity in his 2020 Honda Pilot, estimated at \$40,000, and 3) the available equity in the property at 3505 Condor Court, Carmichael, California, estimated at \$173,065.

1 In consideration of this stipulation, Mr. Chavez Zepeda agrees that neither he nor
2 his wife will sell or in any way transfer their interest in the Honda Pilot or the property at
3 3505 Condor Court, nor shall they take out any additional loans secured by the Pilot or
4 the property at 3505 Condor Court for the duration of his pretrial release in this case.

5 Given the need for Mr. Chavez Zepeda to secure additional information relating to
6 his vehicle, the parties do hereby stipulate and request that the court require Mr. Chavez
7 Zepeda to file the necessary documentation by close of business on Wednesday, April 20,
8 2022.

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10 DATED: April 13, 2022

/s/ Clemente M. Jiménez

CLEMENTE M. JIMÉNEZ

Attorney for JOSE MANUEL CHAVEZ
ZEPEDA

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15 DATED: April 13, 2022

PHILLIP TALBERT
United States Attorney

By: /s/ David Spencer

DAVID SPENCER

Assistant United States Attorney
Attorney for Plaintiff
United States of America

ORDER

The Court having, received, read, and considered the parties' stipulation, and good cause appearing therefrom,

IT IS ORDERED that the Court adopts the parties' stipulation in its entirety as its Order. The deadline to file documentation with the court of the \$500,000 secured bond shall be by close of business on Wednesday, April 20, 2022.

Dated: April 14, 2022



CAROLYN K. DELANEY
UNITED STATES MAGISTRATE JUDGE